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Hearing Date: November 16, 2022
Response Date: July 22, 2022
Reply Date: August 22, 2022

Attorney for Defendant NatWest Markets, N.V.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ABN AMRO BANK, N.V. (presently known as
NATWEST MARKETS, N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**ORAL ARGUMENT
REQUESTED**

Adv. Pro. No. 10-05354 (CGM)

Adv. Pro. No. 11-02760 (CGM)

**NOTICE OF MOTION ON
DEFENDANT NATWEST MARKETS, N.V.'S
MOTION TO DISMISS COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of NatWest Markets, N.V.'s Motion to Dismiss the Complaint, dated May 23, 2022, and upon all prior pleadings and proceedings herein, NatWest Markets, N.V. ("Defendant"), will move this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, on **November 16, 2022**, at 10am Eastern Time, before the Honorable Cecelia G. Morris, Judge, for an order dismissing in its entirety the Consolidated Second Amended Complaint filed in this action by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (ECF No. 220).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Amended Stipulation and Order entered on March 2, 2022 (ECF No. 219), all papers responsive to the Defendant's Motion to Dismiss the Complaint shall be served and filed no later than **July 22, 2022**, and all reply papers in further support of the Defendant's Motion to Dismiss the Complaint shall be served and filed no later than **August 22, 2022**.

PLEASE TAKE FURTEHR NTOICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, the Defendant does not consent to the entry of final orders or judgment by this Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris' guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please

call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court's website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

Dated: New York, New York
May 23, 2022

Respectfully submitted,

By: /s/Michael S. Feldberg

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